

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DANIELLE TAYLOR)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:22-cv-1153-RDA-WBP
)	
REVATURE LLC)	
)	
<i>Defendant.</i>)	
<hr style="border: 1px solid black;"/>)	

**MEMORANDUM IN OPPOSITION
TO PLAINTIFF’S MOTION FOR RECONSIDERATION**

Defendant Revature LLC (“Revature”) hereby submits this Opposition¹ to Plaintiff’s Motion for Reconsideration (Dkt. 71, 72) of the Court’s Memorandum Order of August 30, 2024 (Dkt. 70) (“Order”), which denied both of Plaintiff’s prior unfounded Motions for Disciplinary Enforcement (Dkt. 45, 60).

On a motion to reconsider an interlocutory order, reconsideration should be denied unless “(1) a subsequent trial produces substantially different evidence; (2) controlling authority has since made a contrary decision of law applicable to the issue, or (3) the prior decision was clearly erroneous and would work manifest injustice.” *Aslanturk v. Hott*, 2020 WL 5745799, at *4 (E.D. Va. 2020) (Alston, J.) (quoting *Am. Canoe Ass’n v. Murphy Farms, Inc.*, 326 F.3d 505, 514 (4th Cir. 2003)). Furthermore, “reconsideration is not meant to re-litigate issues already decided, provide a party the chance to craft new or improved legal positions, highlight previously-available

¹ In light of Plaintiff voluminous filings, Defendant is responding to the current matter in summary fashion. If the Court desires, Defendant is more than willing to expand on this Opposition in supplemental briefing or oral argument.

facts, or otherwise award a proverbial ‘second bite at the apple’ to a dissatisfied litigant.” *Id.* (quoting *Wootten v. Virginia*, 168 F. Supp. 3d 890, 893 (W.D. Va. 2016)).

In her Motion for Reconsideration, Plaintiff merely incorporates arguments she has already made in prior pleadings to the Court. Consequently, Plaintiff does not meet the high standard for reconsideration, and the motion must be denied. Furthermore, Plaintiff’s arguments are substantively without merit for the reasons previously briefed. (*See* Dkt. 51, 64.)

CONCLUSION

For the foregoing reasons, Plaintiff’s Motion for Reconsideration should be denied.

Dated: September 16, 2024

Respectfully submitted,

/s/ Micah E. Ticatch

Edward Lee Isler, Va. Bar No. 27985

Micah E. Ticatch, Va. Bar No. 83351

ISLER DARE, P.C.

1945 Old Gallows Road. Suite 650

Vienna, Virginia 22182

Phone: (703) 748-2690

Facsimile: (703) 748-2695

eisler@islerdare.com

mticatch@islerdare.com

Counsel for Defendant Revature LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of September 2024, I served the foregoing via the ECF system and by electronic mail upon the following:

Danielle Taylor
3622 Old Silver Hill Road, #908
Suitland, MD 20746
t842202@gmail.com

Plaintiff, *pro se*

/s/ Micah E. Ticatch
Micah E. Ticatch
ISLER DARE, P.C.
1945 Old Gallows Road. Suite 650
Vienna, Virginia 22182
Phone: (703) 748-2690
Facsimile: (703) 748-2695
mticatch@islerdare.com

Counsel for Defendant Revature LLC